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Summary of key issues raised by auditor

Overall, the auditors found that Sustainable Timber Tasmania has a high degree of compliance with the FSC National Forest Stewardship Standard of Australia and has met 188 (93%) of the indicators applicable to it.

The Audit Report has identified several areas where further action is required before certification can be granted.

These largely relate to three complex issues:

- the management of swift parrot habitat;
- the retention of habitat trees associated with harvested areas; and
- assessing the impact of fire and other disturbances on old growth

Sustainable Timber Tasmania is taking action to address each of these identified complex issues.

This summary document directly quotes the auditors findings, grouped under the three key complex issues described above, and details the actions Sustainable Timber Tasmania is currently or planning to undertake to close out the remaining issues.

General Audit Team Comments

Wide-ranging evidence was provided of improvements made to STT systems since the 2014 FSC FM audit with significant progress made. The professionalism of the staff and commitment to advancing systems and practices were notable and documented throughout the audit. p35

Interviews with stakeholders confirmed that STT is supporting collaborative research into the development of efficient processing technologies, and the identification of high-value applications for logs from plantations and communicates advances to the wider manufacturing facilities located in Tasmania. p37



The audit team acknowledges that the forest products industry in Tasmania has demonstrated high level leadership in seeking compromise and resolution of differences with environmental non-governmental organizations (ENGOS). Support by forest products industry is noted as conformity in stakeholder engagements of STT. Beneficial environmental outcomes that resulted, in part, from cooperative agreements with the forest products industry also contributed to conformity for a variety of indicators under Principle 6. p37

The changes required by STT since 2014 represent a great deal of effort and documentation on the part of all contractors. p38

The audit team notes that the STT personnel interviewed during the audit consistently demonstrated a high level of commitment to forest stewardship of the state lands under their management.

The following commendations substantively underscore positive aspects of STT forestry program regardless of the certification decision:

- 1. STT personnel demonstrate an ethos of responsible management for and stewardship of a robust array of values and resources found on the state lands under their charge.*
- 2. STT personnel interviewed during field audits demonstrated thorough and consistent knowledge of updated and new procedures, reinforced by specific related trainings on the subject matter.*
- 3. As an organization STT demonstrated a culture of innovation and adaptive management through dedication to continuous improvement. Significant changes and improvements are recognized from 2014 to 2019. p67*



Management of Swift Parrot Habitat

Audit team comments

The audit team acknowledges that STT has made significant improvements in its program to identify and protect swift parrot breeding and habitat protection. However, further improvement is necessary to meet FSC Forest Management standard requirements for a Critically Endangered species. p38

Specific corrective action requests from audit report

- *“STT shall protect rare, threatened and endangered species, specifically the Swift Parrot, and their habitats in the Management Unit at operational and landscape level, including through the provision of conservation zones, protection areas, connectivity and other direct means for their survival and/or viability, such as species recovery programs” (Page 51-52)*
- *“STT must undertake and document an assessment of threats to swift parrot, from management activities and other causes. The threat assessment must include a determination of the likelihood of occurrence and the severity of consequences of threats associated with STT’s commercial forest management activities.” (Page 57-58)*
- *“Management Plans must include management strategies and actions to maintain and/or enhance HCVs including critical habitat, and must include consideration of identified threats, such as the sugar glider. For a Critically Endangered species and continued controversy surrounding management approaches, a Management Plan specific to the swift parrot must be developed that meets all requirements of this indicator.” (Page 58-59)*
- *“1) When a new Swift parrot Management Plan is developed it must undergo a stakeholder consultation process aligned with the requirements of 9.2.3 that also includes affected and interested stakeholders and experts outside of the current Tasmanian regulatory framework. These consultations must include appropriate verifiers such as documentation of correspondence, interviews, and data provision from stakeholders; and documentation of responses to stakeholder comment and information.” (Pages 59-60)*
- *“STT must revise and implement strategies and actions that maintain and/or enhance identified High Conservation Values. Strategies and actions must be consistent with the Precautionary Approach, using Best Available Information (consistent with the FSC definition of this term including external experts), and be proportionate to the scale, intensity and risk of management activities.” (Pages 61-62)*
- *“STT must ensure that swift parrot habitat needs are accurately identified, and protections are instituted such that evaluation and monitoring systems are able to detect deficiencies in program effectiveness, particularly relative to maintenance of Critically Endangered species such as the swift parrot. In other words, STT must verify the effectiveness of management strategies including those deficiencies identified in 2019.13-2019.16.” (Pages 62-63)*

Sustainable Timber Tasmania's planned actions

- Sustainable Timber Tasmania is developing a Swift Parrot Management Plan in consultation with stakeholders to detail the strategies and corresponding actions that aim to provide increased conservation for the Swift Parrot in public production forests.
- It is anticipated that the strategies of focus will be:
 - Managing and protecting Swift Parrot breeding habitat
 - Reducing threats to Swift Parrot breeding
 - Enhancing Swift Parrot Breeding habitat
- Prior to the finalisation and implementation of the Swift Parrot Management Plan, Sustainable Timber Tasmania has commenced:
 - Trialling individual habitat tree retention in production forests coupes
 - Investigating trials to reduce the threat of predation from sugar gliders
 - Excluding from production 10,000 hectares of identified potential swift parrot breeding habitat in the southern forests
 - Developing a more effective monitoring program in collaboration with partners
- Sustainable Timber Tasmania will continue to exclude Swift Parrot habitat from harvesting via detailed operational planning and will maintain the precautionary approach of not scheduling harvesting on Bruny Island as it is free of sugar gliders.



Retention of habitat trees associated with harvested areas

Audit team comments

The audit team evaluated harvest coupes during the audit for hollow bearing tree retention due to their importance as wildlife habitat for multiple species. STT has devoted great effort to innovative design methods including use of Variable Retention Harvests. STT has examined leaving (retention) hollow bearing trees in both dispersed and aggregated patterns with corresponding scientific studies that have garnered international recognition. Although aggregate retention is now preferred, the audit team determined there were not enough individual hollow bearing habitat trees retained within harvest coupes. p40

Specific corrective action requests from audit report

- *“STT must modify and document its retention procedures for clear fell operations so as to improve assurances of retention of habitat features such as hollow bearing trees and coarse woody debris within harvest areas.” (Pages 52-53)*
- *“STT must ensure interested and affected stakeholders are engaged in a culturally appropriate way regarding the landscape planning context tool implementation as part of the STT management monitoring and planning processes.” (Pages 53-54)*
- *“STT must ensure that harvesting practices minimize damage to standing residual trees and coarse woody debris on the ground (CWD).” (Page 64)*

Sustainable Timber Tasmania’s planned actions

- Increase the amount of partial harvesting techniques used in harvest areas where habitat trees are present
- Implement new measures to retain habitat trees in high altitude and dry forest partial harvesting systems
- Implement new procedures to retain large old trees
- Implement new coarse woody debris prescriptions in areas harvested by clearfelling



Assessing impact of fire and disturbance on old growth

Audit team comments

The audit team encourages all interested parties to review section 4.4.1.3 Landscape context planning system of the STT Forest Management Plan, April 2019 which is an innovative approach recognized internationally for conservation planning at landscape scales. Such landscape provision for wildlife habitat features at larger scales can place losses of individual larger trees within a broader perspective. p41

Specific corrective action requests from audit report

- *“STT must assess old growth as HCV on the estate in accordance with Annex G and must accord those old growth trees and forest with appropriate protections.” (Page 56-57)*
- *“2) STT must undertake further consultation specific to public education and input as well as additional expert consultation regarding the company’s strategy and management implementation:*
 - *a) General public, defined as interested and affected stakeholders and including local communities as required for consultation by FSC, must continue to be consulted as to the general approach and process used to conduct pre-harvest assessments by FPO’s and use of FPA/DPIPWE GIS resources as related to old growth determination including structure, function, and condition.*
 - *b) Experts: Evaluation of the use of JANIS as basis for landscape level analysis and threat level determinations of forest stands, in particular of old growth; review of improvements to JANIS; and exploration of any new systems for evaluating old growth, e.g. ecologically mature forests with negligible disturbance.” (Page 59-60)*
- *“STT must ensure that monitoring of rare, threatened, and endangered old growth, e.g. ecologically mature forests in relatively undisturbed condition, is sufficient to support maintenance, enhancement, or restoration of such ecosystems; or determining when non-RTE ecologically mature forests become threatened at a finer spatial or temporal scale currently offered. STT must update the old growth mapping in response to disturbance from fire, must demonstrate consideration of other forms of large-scale natural disturbances, such as forest insect and diseases, and then assess such impacts on the conservation status of old growth forest communities.” (Pages 63-64)*

Sustainable Timber Tasmania’s planned actions

- Conduct fieldwork to validate the impact of fires on old growth values
- Consult with experts regarding the validity of old growth conservation targets outlined by the established JANIS criteria
- Confirm the conservation status of old growth forest communities



- Review approach to old growth management
- Develop additional communication collateral and outreach regarding Sustainable Timber Tasmania's adaptable landscape management approach



Other

Sustainable Timber Tasmania's planned actions

- Continue to engage with stakeholders regarding management of Permanent Timber Production Zone land, with a focus on seeking feedback on the above initiatives
- Revised Sustainable Timber Tasmania's Forest Management Plan to incorporate the changes made
- In response to other minor issues identified, Sustainable Timber Tasmania will:
 - Modify monitoring of planned burn impacts
 - Modify its chain of custody system
 - Improve management of training records
 - Continue to implement its contractor safety strategy

